

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

April 19, 2022

**REQUEST GRANTED.**

The Court approves the briefing schedule. Defendant's motion due by May 6, 2022. Government's response due by May 27, 2022. Defendant's reply due by June 10, 2022. The Status Conference previously set for April 26, 2022 is rescheduled to June 15, 2022 at 12:00PM in Courtroom 15C. The Court, with consent of all parties, excludes time from April 19, 2022 until June 15, 2022 pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendant in a speedy trial.

4/19/2022

*By ECF and e-mail*

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Batise Boyce, 21 Cr. 777 (LJL)*

Dear Judge Liman:

I write in response to the Court's Order dated April 14, 2022 – Dkt. No. 12 – to propose a revised briefing schedule for defendant's motion concerning the applicability of the ACCA sentencing enhancement. I have conferred with Assistant U.S. Attorney Hagan Scotten and propose the following schedule: Defendant's motion due on May 6, 2022; Government's response due on May 27, 2022; Defendant's reply due June 10, 2022, to be followed by a conference on a date convenient for the Court.

If the Court endorses the proposed schedule, I respectfully request that the Court adjourn the conference currently scheduled for April 26, 2022 at 3:00 p.m., and exclude time under the Speedy Trial Act until the next conference date to allow briefing and a decision on the motion.

Thank you for your consideration of this request.

Respectfully submitted,

/s/  
\_\_\_\_\_  
Martin Cohen  
Assistant Federal Defender  
(212) 417-8737

cc: Hagan Scotten, Esq., by ECF and e-mail